Michael Kind, Esq. Nevada Bar No.: 13903 KIND LAW 8860 South Maryland Parkway, Suite 106 Las Vegas, Nevada 89123 (702) 337-2322 (702) 329-5881 (fax) mk@kindlaw.com Attorney for Plaintiff Jeremiah Davis

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

Jeremiah Davis,

Plaintiff,
v.

Stipulation to extend deadline to file the discovery plan and scheduling order

Equifax Information Services, Inc., et al,

Defendants.

Case No.: 2:22-cv-00903-JCM-NJK

Stipulation to extend deadline to file the discovery plan and scheduling order

(First request)

Jeremiah Davis ("Plaintiff") and Equifax Information Services, LLC, Bank of America, N.A., and Chexsystems, Inc. ("Defendants") (jointly as the "Parties"), by and through their respective counsel, hereby stipulate to extend Local Rule 26-1's deadlines for the parties to hold their initial Fed. R. Civ. P. 26(f) conference and to file their proposed discovery plan and scheduling order (the "Deadlines").

Good cause exists to extend the Deadlines. The Parties need additional time for counsel to coordinate to set the discovery conference. Additionally, the Parties are engaged in active settlement discussions that may alleviate the need to submit a proposed discovery plan. Therefore, it is appropriate to extend the deadlines for the Parties to file their proposed discovery plan and scheduling order to allow time for the Parties to meet and confer in compliance with Local Rule 26-1(b).

Parties therefore request to extend the Deadlines by 30 days, making the new 1 deadline for the submission of a stipulated discovery plan and scheduling order on 2 October 17, 2022. This is the first request for an extension of this deadline. 3 Dated: September 16, 2022. 4 KIND LAW CLARK HILL PLLC 5 6 /s/ Michael Kind /s/ Gia Marina Michael Kind, Esq. Gia Marina, Esq. 7 8860 South Maryland Parkway, Suite 106 Charles Campbell, Esq. Las Vegas, Nevada 89123 3800 Howard Hughes Drive, 8 Suite 500 9 FREEDOM LAW FIRM, LLC Las Vegas, Nevada 89169 Counsel for Equifax Information 10 Services, LLC /s/ Gerardo Avalos 11 Gerardo Avalos, Esq. 8985 South Eastern Ave., Suite 350 WRIGHT, FINLAY & ZAK, LLP 12 Las Vegas, NV 89123 13 Counsel for Plaintiff Jeremiah Davis /s/ Jory C. Garabedian Jory C. Garabedian, Esq. 14 Darren Brenner, Esq. 15 7785 W. Sahara Ave., Ste. 200 Las Vegas, Nevada 89117 16 Counsel for Bank of America, N.A. 17 and Chex Systems 18 19 IT IS SO ORDERED: 20 21 UNITED STATES MAGISTRATE JUDGE 22 DATED: September 19, 2022 23 24 25 26 27